EG&G ROCKY FLATS

INTEROFFICE CORRESPONDENCE

DATE December 14, 1990 Evap.Mtg-90

TO P.W. Edrich, Mgr., RCRA Permitting, T130C, x7752 PWE

FROM K.W. Ticknor, RCRA Permitting, T130C, x6344 KWT

SUBJECT MEETING WITH CDH, EPA AND DOE TO DISCUSS CLEANOUT OF THE SOLAR EVAPORATION PONDS

On December 12, 1990, representatives from CDH, EPA, DOE, and EG&G met to discuss the Solar Pond Cleanout Project Management Plan. The purpose of this memo is to document the discussion of that meeting. A list of meeting attendees is attached to this memo.

A presentation of the plan to clean up the 207 solar evaporation ponds was given by J. Wienand (DOE-RFO). He gave a general description of the ponds and the trench interceptor system (which pumps water into the 207B pond from a French drain system located north of the pond). Wienand noted that the current evaporation rate in the ponds was insufficient to support an expeditious cleanout and that various techniques were being considered to enhance evaporation. Those techniques included addition of a blue dye, floating aerator units, and a heater-soaker pipe system to the 207A and 207B ponds. Requests for changes to interim status had already been submitted to CDH to allow use of those enhancements.

Wienand then described the portable evaporators that are being procured in order to further expedite evaporation of the water in the 207A and 207B ponds and handle the water that is returned from the trench interceptor system. Wienand gave a conceptual description of the portable surge tanks that are needed in order to separate the trench water from the ponds and serve as a surge volume before the water is sent to the portable evaporators. The tanks would be constructed of double, high-density polymer walls and would be open to the atmosphere. Wienand stated that a request for change to interim status for the evaporators and surge tanks would be submitted the week of December 17, 1990.

Next, Wienand briefly discussed the remaining actions needed to clean up the ponds. Those actions included remixing previously rejected pondcrete into a stable form, having an off-site vendor cement the remaining sludges in the 207A and 207B ponds and the liquid in the 207C pond, and shipping the pondcrete to Nevada Test Site (NTS) for disposal. Lukow (DOE-RFO) noted that DOE-RFO had recently met with representatives from NTS. Lukow stated that there are significant obstacles to overcome in getting NTS ready to accept shipments of pondcrete. Lukow stated that those obstacles could result in delay of the solar pond cleanout.

Lukow further stated that DOE currently had a funding shortage for the solar pond cleanout project. Lukow stated that they were attempting to get more funding from DOE headquarters but they were pessimistic about getting full funding. Lukow cited the funding shortage as issue that would likely delay the project. CDH (Baughman) asked if the funding shortage would result in

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By [signature]
Date 7/17/92

A-OU04-000103

RFP not meeting the Agreement in Principle date (October 1991) for cleanout of the ponds and removal of the pondcrete. Lukow said that if DOE-RFO did not get the required funds, the Agreement in Principle date would not be met.

After discussion of the plan, DOE (Wienand) stated that approval of the evaporation enhancements was needed now and asked CDH if verbal approval could be given at this time. Dowsett (CDH) stated that approval of the dye was on his desk now and he anticipated no problems with the other enhancements except for controlling the aerators' spray so that water would not be blown over the ponds' berm. Dowsett suggested the aerator system be modified so that an alarm would sound if the aerator automatically shut off due to excessive wind speed. Shepherd (EG&G) stated that adding an alarm to the system would not be a problem. Dowsett stated that verbal approval of the enhancements (with the alarm stipulation) could probably be given by December 14, 1990.

Dowsett stated that approval of the evaporation system would be more difficult than approval of the enhancements because the evaporators would be considered treatment units and the evaporators' distillate would be reused in the plant's raw water system. CDH was also concerned with the possibility of deterioration of the polymer liner of the portable surge tanks for the trench interceptor water. Dowsett stated that CDH would consider the portable tanks to be temporary only and that more permanent tanks would eventually have to be built. Dowsett was also concerned about the location of the tanks in case a leak developed. It was noted that the tanks would be located such that drainage would be directed toward the pump house for the trench interceptor system. A question was raised as to whether or not the evaporators and tanks would eventually require a permit since they would need to continue to operate beyond the expiration date for interim status (November 8, 1992). Dowsett stated that a permit would not be needed since the evaporators and tanks would be considered part of the corrective action for the ponds under the soon-to-be-issued Interagency Agreement.

Hestmark (EPA) asked if the issue of Land Disposal Restrictions had been addressed for the trench water that was currently being discharged to the 207B solar evaporation pond. Kiefer (DOE-RFO) stated that DOE was sending a letter to address that issue next week (the week of December 17, 1990). Hestmark seemed anxious to get that letter.

Hestmark (EPA) was also concerned over the reuse of the distillate from the portable evaporators as a substitute for raw water used in the plant cooling towers and condensate systems. Specifically, Hestmark noted that EG&G would have to ensure the distillate would not adversely impact the quality of water discharged from the plant, ensure there was actually a need for the amount of distillate produced, and ensure the distillate was actually reused (and not sent directly to the sewage treatment plant). EG&G (Ticknor) stated that those issues had been addressed. The sampling plan was designed to ensure the water was an effective substitute for raw water and would not affect the quality of the plant's discharge, raw water data for the plant indicated a need for the water, and the systems for reusing the distillate would be checked to ensure the distillate would actually be reused.

Hestmark (EPA) questioned whether or not the 500,000 gallon distillate surge tank would have secondary containment. Ticknor stated that the distillate would be not discharged to the

500,000 gallon tank until receipt of acceptable sampling results showing the distillate to be an acceptable substitute for raw water, and be considered an effective substitute for the commercially available raw water. Therefore, the distillate would be considered excluded from regulation as a RCRA solid waste and no secondary containment for the tank would be required. Hestmark and Dowsett appeared to agree with that logic.

After the meeting, I asked Baughman (CDH) when he thought CDH would issue the Rocky Flats Plant permit for storage of hazardous and low-level mixed wastes. Baughman said that they were still waiting for the Interagency Agreement to be signed before they would issue the permit. Baughman said that they wanted to incorporate any changes to the corrective action portion of the permit that would be necessitated by the Interagency Agreement. He said that they would like to get those changes in the permit now rather than have to issue a permit modification (which would require public comment) after the Interagency Agreement is issued. Baughman thought the permit would be issued approximately four weeks after the Interagency Agreement is signed.

After lunch, CDH was taken on a tour of the solar evaporation ponds and the proposed location for the portable evaporators (Building 910). No significant issues were raised by CDH during the tour. CDH took a great deal of interest in the bubbles that have developed under the lining of the 207B South pond. In addition, Dowsett (CDH) wanted to make sure that any liquid that could accumulate in the sump of the Building 910's basement (containment for the evaporators' tanks) could not be discharged out of Building 910.

In conclusion, I thought the meeting was productive and that CDH appeared to be cooperative with our efforts to clean up the solar ponds in an expeditious manner.

KWT:aaf

Attachment :
As Stated

cc:

M. B. Arndt
P. M. Arnold
A. A. Church
P. W. Edrich
L. B. Eng
J. E. Evered
T. C. Greengard
R. W. Hawes
R. E. James
M. L. Johnson
J. M. Kersh
D. M. Krieg
M. E. Levin
E. F. Lombardi
R. V. Morgan
G. M. Pinson
G. L. Potter
J. D. Roberts
T. J. Satkowski
A. L. Schubert
D. A. Shepherd
P & C Files

List of Attendees

CDH:

D. Shelton
G. Baughman
F. Dowsett
N. Matsuura
D. Mauer
J. Shieffelin

EPA:

M. Hestmark

DOE-RFO:

T. Lukow
G. Huffman
J. Wienand
J. Kiefer
M. Vargas
H. Rose
S. Eriksen
J. Comins-Rick

DOE-LATO:

D. French

EG&G:

J. Guadagnoli
E. Lombardi
R. Morgan
D. Pierson
D. Shepherd
D. Tallman
K. Ticknor